

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 11-0114-WHA
)	
Plaintiff,)	
)	STIPULATION AND PROPOSED
v.)	ORDER EXCLUDING TIME FROM
)	SPEEDY TRIAL ACT CALCULATION
DAVID JEFFERSON,)	(18 U.S.C. § 3161(h)(7)(A))
)	
Defendant.)	

With the agreement of the parties, and with the consent of defendant David Jefferson, the Court enters this order documenting defendant's exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1), from March 22, 2011, to April 12, 2011. The parties agree, and the Court finds and holds, as follows:

1. Defendant agreed to an exclusion of time under the Speedy Trial Act. His counsel required time to review discovery (some 200 pages of discovery) recently produced by the government and to discuss it with the defendant, as well as to conduct an investigation into possible defenses (which includes consulting with counsel who represented the defendant in a state court proceeding). Accordingly, failure to grant the requested continuance would have

1 unreasonably denied defendant's counsel the reasonable time necessary for effective preparation,
2 taking into account the exercise of due diligence, in this case. The government concurred that
3 such a continuation was necessary for the stated reasons.

4 2. Given these circumstances, the Court found that the ends of justice served by
5 excluding the period from March 22, 2011, to April 12, 2011, outweigh the best interest of the
6 public and the defendant in a speedy trial. Id. at § 3161(h)(7)(A).

7 3. Accordingly, and with the consent of the defendant, at the hearing on March 22,
8 2011, the Court ordered that the period from March 22, 2011, to April 12, 2011, be excluded
9 from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(7)(A) & (B)(iv).

10 IT IS SO STIPULATED.

11
12 DATED: March 22, 2011

/S/

ELIZABETH M. FALK
Assistant Federal Public Defender
Attorney for the Defendant


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14
15 DATED: March 22, 2011

/S/

ANDREW M. SCOBLE
Assistant United States Attorney

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19 IT IS SO ORDERED.

20
21 DATED: March 23, 2011.



HON. WILLIAM H. ALSUP
United States District Judge